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UNITED STATES OF AMERICA

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION

UNITED STATES OF AMERICA,

No. 2:18-CV-04420-JFW-SSx

15 Plaintiff,

PLAINTIFF UNITED STATES OF
AMERICA'S EX PARTE APPLICATION FOR
AN ORDER UNSEALING THE
DECLARATIONS OF SPECIAL AGENT
ELIZABETH RIVAS; DECLARATION OF
AUSA MAXWELL COLL

ONE ANCIENT MOSAIC

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20 || Defendant.

MOHAMAD YASSIN ALCHARIHI /

Claimant.

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26 The United States of America hereby applies to this Court ex
27 parte for an order unsealing the declarations of Special Agent
28 Elizabeth Rivas filed in the above-captioned civil-forfeiture action
on December 20, 2018 (Dkt. 45); February 21, 2019 (Dkt. 52); April

1 22, 2019 (Dkt. 58); June 20, 2019 (Dkt. 63); August 20, 2019 (Dkt.
2 68); October 23, 2019 (Dkt. 75); December 18, 2019 (Dkt. 80);
3 February 14, 2020 (Dkt. 86); April 15, 2020 (Dkt. 91); and June 12,
4 2020 (Dkt. 96). This application is based on the attached
5 declaration of AUSA Maxwell Coll and the records and files of this
6 case.

7 DATED: September 22, 2022 Respectfully submitted,

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9 E. MARTIN ESTRADA
10 United States Attorney
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14
15 /s/ Maxwell Coll
MAXWELL COLL
16 Assistant United States Attorney
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UNITED STATES OF AMERICA
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DECLARATION OF AUSA MAXWELL COLL

I, Maxwell Coll, hereby declare and state as follows:

1. I am an Assistant United States Attorney for the Central District of California. This declaration is made in support of the government's application for an order unsealing several declarations of Special Agent Elizabeth Rivas filed in United States v. One Ancient Mosaic, 2:18-CV-04420-JFW-SSx. The government filed the sealed declarations in support of the parties' stipulated request to stay the civil-forfeiture proceeding pending the parallel criminal investigation and criminal case, United States v. Mohamad Yassin Alcharihi, 2:20-CR-00307-GW, and in connection with several status reports filed after this Court granted the requested stay. Specifically, the government seeks to unseal the declarations filed on December 20, 2018 (Dkt. 45); February 21, 2019 (Dkt. 52); April 22, 2019 (Dkt. 58); June 20, 2019 (Dkt. 63); August 20, 2019 (Dkt. 68); October 23, 2019 (Dkt. 75); December 18, 2019 (Dkt. 80); February 14, 2020 (Dkt. 86); April 15, 2020 (Dkt. 91); and June 12, 2020 (Dkt. 96).

2. At the time the government filed the sealed declarations, the government's investigation and preparation for criminal trial was ongoing, and it was necessary to seal the declarations so as not to jeopardize the investigation and reveal the government's trial strategy.

3. The government believes that the facts and circumstances that initially warranted sealing in this case are no longer in effect. Accordingly, the government seeks to produce the affidavits to defense counsel as part of the discovery process in United States v. Mohamad Yassin Alcharihi, 2:20-CR-00307-GW.

3. The government respectfully requests that the Court issue an order unsealing the declarations.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on September 22, 2022 at Los Angeles, California.

/s/ Maxwell Coll
MAXWELL COLL
Assistant United States Attorney